

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

MATTHEW POWER,

Plaintiff,

v.

CONNECTWEB TECHNOLOGIES, INC.,
MICHAEL BEAULIEU, PAUL BEAULIEU,
RUBBER STAMP CHAMP, INC., ANCHOR
RUBBER STAMP & PRINTING CO., INC.,
THE J.P. COOKE COMPANY, and
GOOGLE LLC,

Defendants.

Civil Action No. 1:22-cv-10030-JGD

**CONNECTWEB'S EMERGENCY MOTION FOR AN ORDER THAT PLAINTIFF
TAKE DOWN CONNECTWEB SOURCE CODE, PLAINTIFF'S REQUEST TO HACK
CONNECTWEB SITES, AND SOLICITATION TO MAKE \$3,500 UNAUTHORIZED
CREDIT CARD CHARGES ON CARDS OF CONNECTWEB CUSTOMERS**

Pursuant to Local Rule 40.4 and this Court's inherent power to manage its own proceedings and control the conduct of the litigants who appear before it,¹ Defendants Connectweb Technologies, Inc., Michael Beaulieu, and Paul Beaulieu (collectively "**Connectweb**"), hereby submit this Emergency Motion for an Order That Plaintiff Take Down Harassing Content From The Internet. Connectweb requests that the Court order Matthew Power ("**Plaintiff**") to cease and desist from (a) posting Connectweb's source code on the Internet, (b) soliciting hackers to hack web sites running Connectweb's software, and (c) encouraging hackers to make unauthorized \$3,500 charges on the credit cards of Connectweb Customers, including

¹ See *Chambers v. Nasco*, 501 U.S. 32, 46-50, 111 S. Ct. 2123, 115 L. Ed. 2d 27 (1991); *United States v. Kouri-Perez*, 187 F.3d 1, 6-8 (1st Cir. 1999); *Bradeen v. Bank of NY Mellon Trust Co.*, No. 18-cv-11753, 2018 U.S. Dist. LEXIS 188586, 2018 WL 5792319, at *2 (D. Mass. Nov. 2, 2018).

without limitation taking down the webpage, <http://customvantage.net/cvw.html>.

In support of this Emergency Motion, Connectweb states as follows:

- 1) Plaintiff has a history of harassing Connectweb and its customers. The harassment included threatening to email customers of Rubber Stamp Champ Inc. (“**Rubber Stamp Champ**”) one of Connectweb’s customers that their credit cards had been compromised and threatening to run charges on those cards if Connectweb and Rubber Stamp Champ did not accede to his demands. See ECF No. 74 (for a fuller history of Plaintiff’s harassment).
- 2) On November 9, 2022, Connectweb filed an Emergency Motion for an Order That Plaintiff Stop His Harassment and Threats with this Court.
- 3) On November 17, 2022, the parties reached an agreement during a hearing before this Court.
- 4) Based on this agreement, on November 18, 2022, the Court ordered that “To the extent any party wishes to file private or confidential information with the court, that party may file a motion to file the information under seal.” ECF. No. 76 at ¶ 3 (referred to herein as “November 18 Order”).
- 5) The Court also ordered that Plaintiff “shall give the defendants at least 14 days advance notice before contacting any of the defendants’ customers in order to give the defendants an opportunity to file any appropriate motion for a protective order. This includes any contact with the defendants’ customers regarding credit card charges.” The Court also ordered that Plaintiff “will not publish any further personal information about the defendants or their principals on the internet while this matter remains pending.” ECF No. 76.

- 6) On or about January 4, 2023, Connectweb became aware that Plaintiff released Connectweb's source code on his website and invited hackers throughout the world to hack all of the sites that Connectweb hosts in order to access and make fraudulent purchases with the credit card information of Connectweb's customers. Plaintiff even outlined financial incentives, spending parameters, and offered use of his own virtual private network for the hackers. Specifically, Plaintiff stated on his website, "Power will authorize \$500,000 in charges per day per group. (\$3,500 per card x 143 cards)." Additionally, Plaintiff identified by name this pending matter, *Power v. Connectweb* on his website. A PDF of this webpage on Plaintiff's website is attached hereto as **Exhibit A.**
- 7) Plaintiff has now enlisted hackers as his agents to make fraudulent \$3,500 charges on the credit cards of Connectweb's customers.
- 8) Plaintiff directly links his posting of Connectweb's source code and solicitation of hacking to his demand that Connectweb pay him \$150 billion.
- 9) This behavior by Plaintiff is harassment of an order of magnitude greater than the harassment that the Court addressed in its November 18, 2022 Order.
- 10) The webpage posted by Plaintiff also constitutes an indirect violation of the Court's Order for Plaintiff not to contact Connectweb's customers without 14-day notice because Plaintiff is recruiting individuals around the world to take action that this Court forbids him to take directly.
- 11) This motion qualifies as an emergency because Plaintiff's harassing conduct is ongoing and Plaintiff has presented Connectweb's sources code to hackers and invited them to take illegal actions, including fraudulently charging \$3,500 each to an

unknown number of Connectweb's customers' credit cards, in the near future. See
Local Rule 40.4.

For these reasons, Connectweb respectfully requests that the Court order Plaintiff:

- 1) to cease and desist from (a) posting Connectweb's source code on the Internet, (b) soliciting hackers to hack web sites running Connectweb's software, and (c) encouraging hackers to make unauthorized \$3,500 charges on the credit cards of Connectweb Customers, including without limitation taking down the webpage, <http://customvantage.net/cvw.html>;
- 2) to cease and desist from harassing Defendants and their customers; and
- 3) and take or prohibit any other action that the Court deems appropriate.

Respectfully submitted,

CONNECTWEB TECHNOLOGIES, INC.,
MICHAEL BEAULIEU, and PAUL
BEAULIEU

By their attorney,

/s/ Kenneth R. L. Parker

Kenneth R. L. Parker (BBO No. 688987)

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Dated: January 11, 2023

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the CM/ECF system on January 11, 2023, and will be served electronically to the registered participants as identified on the Notice of Electronic Filing through the Court's transmission facilities, and that non-registered participants have been served this day by mail.

/s/ Kenneth R. L. Parker

LOCAL RULE 7.1(a)(2) CERTIFICATE

This Court waived the requirement that the parties confer before filing a motion pursuant to Local Rule 7.1 in its November 18, 2022 order. Thus, Connectweb has not conferred with Mr. Power before filing this Emergency Motion on January 11, 2023.

/s/ Kenneth R. L. Parker